



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

February 11, 2011

Palmer L. Jenkins  
Superintendent  
North Cascades National Park Service Complex  
810 State Route 20  
Sedro Woolley, Washington 98284

Re: Comments on the Draft Stehekin River Corridor Implementation Plan and  
Environmental Impact Statement (EPA Project Number: 08-010-NPS)

Dear Mr. Jenkins:

The US Environmental Protection Agency (EPA) has reviewed the National Park Service (NPS) **Draft Stehekin River Corridor Implementation Plan (DSRCIP) and Environmental Impact Statement (DEIS)** (CEQ # 20100356) on Lake Chelan National Recreation Area (LCNRA) of the North Cascades National Park Service Complex (NCNPKC) in Whatcom, Skagit and Chelan Counties, WA. We conducted our review in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The draft SRCIP/EIS evaluates potential environmental impacts of a proposal to implement management actions to address flooding and erosion threats to NPS facilities, private development, and natural resources within LCNRA. If implemented as proposed, this project would result in long-term sustainability of infrastructure and protection of resources in the planning area from flooding and erosion impacts. Analysis of potential impacts from the project considered four alternative actions (1-4), including a No Action. The NPS's *Preferred Alternative* is Alternative 2 under which there would be relocation and removal of public and private facilities out of the river floodplain, updates to the 1995 Land Protection Plan, and improvement of existing and construction of new recreation opportunities (rafting, camping, and hiking trails). Other activities would include closure of a shooting range, erosion control, and restoration.

EPA supports the goals of the proposed project, which are to protect public resources from flood and erosion risks and ensure persistent public enjoyment of park resources and values. We are particularly pleased with the management strategy of recovering much of the lower Stehekin River's natural floodplain dynamics and functions. This approach will likely yield multiple benefits for habitat, hydrology, and water quality. We also note with appreciation that the draft SRCIP/EIS addresses many of the issues we raised during the project scoping process in March 2008, and that NPS created an interdisciplinary committee to assist with technical and regulatory inputs on a range of issues analyzed in the EIS, especially mitigation measures to offset impacts of the project.

Based on our review of the draft SRCIP/EIS, we have no objections to the proposed project and have assigned a rating of LO (Lack of Objections) to the draft SRCIP/EIS. An explanation of this rating is enclosed. Overall, most impacts by the proposed project are expected to be beneficial. Road and facility construction activities will likely generate some adverse impacts to various resources including air, water and biological resources. We believe the DEIS effectively evaluates potential impacts and identifies suitable measures to avoid, minimize, or mitigate those impacts. We offer the following comments as suggestions to enhance the final EIS.

### **Water quality and hydrology**

The final SRCIP/EIS should include up to date information, as available, on National Pollutant Discharge Elimination System (NPDES), Clean Water Act §401 and 404 permit applications for the project.

We encourage NPS to consider use of Low Impact Development (LID) techniques where applicable in project activities because of their potential to reduce stormwater volumes and thus mimic natural conditions as closely as possible. Use of these techniques can also provide energy and other utility savings. There is some information about LID practices online at <http://www.lowimpactdevelopment.org/> and <http://www.epa.gov/smartgrowth/stormwater.htm>.

Please correct the statement in the draft SRCIP/EIS that the project will require at least one nonpoint source discharge (NPDES) permit (p. 411). The National Pollutant Discharge Elimination System (NPDES) permit controls water pollution by regulating point sources that discharge pollutants into waters of the United States.

Information in the draft SRCIP/EIS states that because of meeting tested standards for water quality, the Stehekin River is on Washington State's list of Category 1 water bodies (p. 181). If data are available, it would be useful to know the parameters tested and associated numeric water quality standards. That will make it easier for the reader to understand the level of potential impacts on water quality described in the SRCIP/EIS and implications for beneficial uses.

### **Climate change effects**

We understand that the basic, underlying need for this project is adapting to hydrologic changes that have occurred as the local climate has changed. In our scoping comments on the project in March 2003, we recommended that the draft SRCIP/EIS discuss the effects of climate change on park resources and potential project impacts on climate change. EPA agrees that climate change modeling for the project is not necessary (p. 47). However, we believe that the final EIS would be enhanced by inclusion of a separate discussion on climate change in the region in terms of observed changes to date, expectations for the future, and how those relate to this project and associated park resources.

We note that the NPS has set up the Inventory and Monitoring Program to collect and analyze data to detect ecological changes associated with climate change. In addition, NPS is developing the landscape-scale dynamics project, or NPScape, to provide information about changes and trends in landscape indicators, including human population trends, road density and land cover. If the North Cascades National Park Service Complex engages in those efforts, it would be valuable to discuss data collected for that purpose and implications for the proposed project activities.

Thank you for the opportunity to review this draft SRCIP/EIS. If you have questions or comments concerning our review, please contact me at (206) 553-1601 or Theo Mbabaliye of my staff at (206) 553-6322.

Sincerely,

A handwritten signature in blue ink, reading "Christine B. Reichgott". The signature is fluid and cursive, with the first name "Christine" being more prominent.

Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

Enclosures  
EPA Rating System Criteria for EISs

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.